

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CR. No. 2:23-cr-20191-MSN
)	
EMMITT MARTIN, III)	

NOTICE OF JOINDER

The defendant, Emmitt Martin, III, through counsel, respectfully files this notice of joinder to the following motions and any supporting memoranda, notices, and replies to responses to the original motion.

1. Defendant Haley's Motion to Compel Discovery and Order United States to Produce and Index of Investigative Material the United States Possesses but does Not Intend to Produce (ECF No. 59 at PageIDs 166–169.)
2. Defendant Haley's Notice of Amendment to Motion to Compel Discovery (R. 59) and Reply to Government's Response (ECF No. 65 at PageIDs 195–197.)
3. Defendant Haley's Motion to Exclude Any Opinions Pursuant to FRE 702, 703, 705 (ECF No. 95 at PageIDs 282–284.)
4. Defendant Haley's Unopposed Motion for Use of a Juror Questionnaire (ECF No. 96 at PageIDs 286–288.)
5. Defendant Haley's Unopposed Motion to Set March 1, 2024 Deadline for Government to Disclose All Transcripts it Intends to Use at Trial (ECF No. 97 at PageIDs 290–291.)
6. Defendant Haley's Motion for a Bill of Particulars (ECF No. 127 at PageIDs 418–428.)
7. Defendant Haley's Motion for Written Proffer of Statements Government Intends to Seek to Admit Pursuant to Fed. R. Evid. 801(d)(2)(E) (ECF No. 128 at PageIDs 431–435.)
8. Defendant Haley's Motion to Compel Discovery of Demetrius Haley's Statements (ECF No. 129 at PageIDs 437–440.)
9. Defendant Haley's Sealed Document Regarding Alleged 404(b) (ECF No. 130.)¹

¹ This motion was filed under seal; counsel does not have access to the PageID numbers.

10. Defendant Haley's Motion for Change of Venue or for Alternative Relief (ECF No. 131 at PageIDs 450–465.)
11. Defendant Haley's Motion to Compel Discovery of Material Related to "Official Forensic Biology Report" the Government Produced in Discovery (ECF No. 157 at PageIDs 2252–2254.)
12. Defendant Haley's Motion *in limine* to Restrict Law Opinion Testimony Regarding Use of Force (ECF No. 158 at PageID 2260–2264.)
13. Defendant Haley's Motion to Exclude "Expert" Opinions on "Use of Force Issues" Pursuant to FRE 702, 703, 705 (ECF Nos. 160 at PageIDs 2268–2278.)

Respectfully submitted this 7th day of February 7, 2024.

RITCHIE, DAVIES, JOHNSON, & STOVALL, P.C.

/s/Stephen Ross Johnson

STEPHEN ROSS JOHNSON [TN BPR No. 022140]
CATALINA L.C. GOODWIN [TN BPR No. 038660]
606 W. Main Street, Suite 300
Knoxville, TN 37902
(865) 637-0661
www.rdjs.law
johnson@rdjs.law
goodwin@rdjs.law

THE LAW OFFICE OF MASSEY MCCLUSKY
FUCHS & BALLENGER

/s/ William D. Massey

WILLIAM D. MASSEY [BPR No. 9568]
3074 East Road
Memphis, TN 38128
(901) 384-4004
w.massey3074@gmail.com

CERTIFICATE OF SERVICE

I certify that on February 7, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson